

## Message Text

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PAGE 01 BRASIL 05241 241524Z  
ACTION ARA-14

INFO OCT-01 ISO-00 ARAE-00 EB-07 L-03 CIAE-00 INR-07

NSAE-00 SP-02 AID-05 /039 W

-----076157 241538Z /40

P 241515Z JUN 77

FM AMEMBASSY BRASILIA

TO SECSTATE WASHDC PRIORITY 2429

SEC TREASURY WASHDC

LIMITED OFFICIAL USE BRASILIA 5241

FOR SECRETARY OF TREASURY BLUMENTHAL

E.O. 11652: N/A

TAGS: EFIN, BR

SUBJ: LETTER FROM FINANCE MINISTER SIMONSEN TO SECRETARY OF  
TREASURY BLUMENTHAL RE TALKS CONCERNING IRS RULING:

THE EMBASSY HAS RECEIVED A LETTER FROM FINANCE  
MINISTER SIMONSEN FOR SECRETARY OF THE TREASURY  
BLUMENTHAL WHICH WILL BE FORWARDED IN TO-DAY'S POUCH.  
FOLLOWING IS TEXT: BEGIN QUOTE

DEAR MR. SECRETARY,

THANK YOU FOR YOUR LETTER OF MAY 24, 1977 AND THE  
INVITATION TO DISCUSS WITH YOU THE RULING ISSUED BY THE  
INTERNAL REVENUE SERVICE OF NOVEMBER 22, 1976 WITH  
RESPECT TO THE CREDITABILITY AGAINST U.S. INCOME TAX  
OF THE BRAZILIAN WITHHOLDING TAX ON INTEREST PAID TO  
U.S. LENDERS.

I CONSIDER TO BE VERY IMPORTANT THAT DISCUSSIONS  
ON THIS SUBJECT BE HELD AS SOON AS POSSIBLE IN ORDER  
TO AVOID THAT ANY DECISION TAKEN AFFECTS THE FLOW  
OF LOANS FROM THE UNITED STATES TO BRAZIL. THE  
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DISCUSSIONS CAN BE HELD EITHER IN WASHINGTON OR  
BRAZILIA, AS YOU WOULD PREFER.

I HAVE ASKED MR. FRANCISCO NEVES DORNELLES,  
ATTORNEY GENERAL FOR THE MINISTER OF FINANCE, TO  
CONTACT MEMBERS OF YOUR STAFF IN ORDER TO FIX  
A DATE FOR THE DISCUSSIONS.

WITH KINDEST REGARDS,

SINCERELY YOURS,

MARIO HENRIQUE SIMONSEN  
MINISTER OF FINANCE

END QUOTE  
JOHNSON

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NNN

## Message Attributes

**Automatic Decaptoning:** X  
**Capture Date:** 01-Jan-1994 12:00:00 am  
**Channel Indicators:** n/a  
**Current Classification:** UNCLASSIFIED  
**Concepts:** FINANCE, DIPLOMATIC COMMUNICATIONS  
**Control Number:** n/a  
**Copy:** SINGLE  
**Sent Date:** 24-Jun-1977 12:00:00 am  
**Decaption Date:** 01-Jan-1960 12:00:00 am  
**Decaption Note:**  
**Disposition Action:** RELEASED  
**Disposition Approved on Date:**  
**Disposition Case Number:** n/a  
**Disposition Comment:** 25 YEAR REVIEW  
**Disposition Date:** 22 May 2009  
**Disposition Event:**  
**Disposition History:** n/a  
**Disposition Reason:**  
**Disposition Remarks:**  
**Document Number:** 1977BRASIL05241  
**Document Source:** CORE  
**Document Unique ID:** 00  
**Drafter:** n/a  
**Enclosure:** n/a  
**Executive Order:** N/A  
**Errors:** N/A  
**Expiration:**  
**Film Number:** D770226-0995  
**Format:** TEL  
**From:** BRASILIA  
**Handling Restrictions:** n/a  
**Image Path:**  
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**Legacy Key:** link1977/newtext/t19770623/aaaaatxy.tel  
**Line Count:** 72  
**Litigation Code IDs:**  
**Litigation Codes:**  
**Litigation History:**  
**Locator:** TEXT ON-LINE, ON MICROFILM  
**Message ID:** 79874977-c288-dd11-92da-001cc4696bcc  
**Office:** ACTION ARA  
**Original Classification:** LIMITED OFFICIAL USE  
**Original Handling Restrictions:** n/a  
**Original Previous Classification:** n/a  
**Original Previous Handling Restrictions:** n/a  
**Page Count:** 2  
**Previous Channel Indicators:** n/a  
**Previous Classification:** LIMITED OFFICIAL USE  
**Previous Handling Restrictions:** n/a  
**Reference:** n/a  
**Retention:** 0  
**Review Action:** RELEASED, APPROVED  
**Review Content Flags:**  
**Review Date:** 06-Dec-2004 12:00:00 am  
**Review Event:**  
**Review Exemptions:** n/a  
**Review Media Identifier:**  
**Review Release Date:** n/a  
**Review Release Event:** n/a  
**Review Transfer Date:**  
**Review Withdrawn Fields:** n/a  
**SAS ID:** 2048289  
**Secure:** OPEN  
**Status:** NATIVE  
**Subject:** LETTER FROM FINANCE MINISTER SIMONSEN TO SECRETARY OF TREASURY BLUMENTHAL RE TALKS CONCERNING IRS RULING: THE EMBASSY HAS RECEIVED A LETTER FROM FIN ANCE  
**TAGS:** EFIN, BR, (SIMONSEN), (BLUMENTHAL)  
**To:** STATE TRSY  
**Type:** TE  
**vdkgvwkey:** odbc://SAS/SAS.dbo.SAS\_Docs/79874977-c288-dd11-92da-001cc4696bcc  
**Review Markings:**  
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